

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN EXPRESS FINANCIAL
ADVISORS, INC.,

Plaintiff,

v.

NEIL H. GENDREAU,

Defendant.

Civil Action No.

04-40221

FILED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2004 OCT 27 P 3:02

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION FOR ADMISSION

OF TODD W. SCHNELL PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), the plaintiff American Express Financial Advisors, Inc., and the undersigned counsel hereby move for the admission *pro hac vice* of Todd W. Schnell of Dorsey & Whitney, LLP, 50 South Sixth Street, Suite 1500, Minneapolis, Minnesota, 55402, to appear in this action on behalf of the plaintiff. In support of this Motion, the Affidavit of Todd W. Schnell is filed concurrently herewith. Further, the plaintiff has retained the undersigned local counsel, Scibelli and Whiteley, LLP, 45 School Street, 3rd Floor, Boston, MA 02108, to concurrently appear in this action and assist as necessary.

FILING FEE PAID:

RECEIPT # 403434
AMOUNT \$ 40.00
BY DPTY CLK RH
DATE 10-27-04

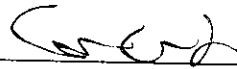
WHEREFORE, the movants respectfully request that the Court admit Todd W. Schnell as counsel *pro hac vice* in the above-captioned matter.

LOCAL RULE 7.1 CERTIFICATE

The undersigned counsel was unable to confer with opposing counsel on the subject of this motion as no counsel has yet to enter an appearance for the defendants.

Respectfully submitted,
AMERICAN EXPRESS FINANCIAL
ADVISORS, INC.

By its attorneys,



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-and-

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DATED: October 27, 2004